

1 RENE L. VALLADARES  
Federal Public Defender  
2 Nevada State Bar No. 11479  
MADELINE S. LAL  
3 Assistant Federal Public Defender  
411 E. Bonneville, Ste. 250  
4 Las Vegas, Nevada 89101  
(702) 388-6577/Phone  
5 (702) 388-6261/Fax  
6 Madeline\_Lal@fd.org

7 Attorney for Rene Alexander Dendaas

8 **UNITED STATES DISTRICT COURT**  
9 **DISTRICT OF NEVADA**

10  
11 United States of America,

12 Plaintiff,

13 v.

14 Rene Alexander Dendaas,

15 Defendant.  
16

Case No. 2:13-cr-00199-APG-PAL

**Joint Stipulation Regarding a  
Reduction in Sentence**

17 In compliance with Second Amended General Order 2023-09, the parties,  
18 Jason M. Frierson, United States Attorney, and Jim W. Fang, Assistant United  
19 States Attorney, counsel for the United States of America, and Rene L. Valladares,  
20 Federal Public Defender, and Madeline S. Lal, Assistant Federal Public Defender,  
21 counsel for Rene Alexander Dendaas, file this Joint Stipulation.

22 The parties state as follows:

23 1. Undersigned counsel and government counsel have determined that  
24 Mr. Dendaas qualifies for a sentence reduction under United States Sentencing  
25 Guidelines Amendment 821 and have reached an agreement regarding a proposed  
26 sentencing reduction.

1           2.     Defense counsel has spoken to the defendant. The defendant  
2 consents to the proposed sentencing reduction detailed below. The defendant  
3 waives any right to appear telephonically or in person at a hearing, should this  
4 Court find a hearing is necessary.

5           3.     On July 21, 2015, this Court sentenced Mr. Dendaas to 105 months  
6 as to Count 1, in addition to 120 months as to Count 2 to run consecutive for a total  
7 of 225 months' incarceration. ECF No. 67. Mr. Dendaas was in CHC VI with a  
8 total offense level of 22, which yielded a sentencing guideline range of 84–105  
9 months for Count 1. Under the amended Guidelines, the parties have determined  
10 that for Count 1, Mr. Dendaas is in CHC V with a total offense level of 22 which  
11 yields a guideline range of 77–96 months.

12           4.     Consistent with U.S.S.G. § 1B1.10, the parties are proposing Mr.  
13 Dendaas' sentence be amended to 96 months for Count 1, in addition to 120 months  
14 as to Count 2, for a total of 216 months.

15           DATED this 2nd day of May, 2024.

16  
17  
18     RENE L. VALLADARES  
19     Federal Public Defender

20     JASON M. FRIERSON  
21     United States Attorney

22     By /s/ Madeline S. Lal

23     MADELINE S. LAL  
24     Assistant Federal Public Defender

25     By /s/ Jim W. Fang

26     JIM W. FANG  
   Assistant United States Attorney

1 UNITED STATES DISTRICT COURT  
2 DISTRICT OF NEVADA

3 United States of America,  
4 Plaintiff,  
5

6 v.

7 Rene Alexander Dendaas,  
8 Defendant.  
9

Case No. 2:13-cr-00199-APG-PAL  
**ORDER**

10 The Court has considered the parties' proposed resolution and the factors  
11 set out in 18 U.S.C. § 3553(a) and under U.S.S.G. § 1B1.10.

12 IT IS THEREFORE ORDERED that the parties' proposed amended  
13 sentence is accepted. Pursuant to Second Amended General Order 2023-09, an  
14 AO247 form reflecting the amended sentence will be filed.

15 DATED this 3rd day of May, 2024.

16  
17 

18 UNITED STATES DISTRICT JUDGE  
19  
20  
21  
22  
23  
24  
25  
26